

DMB:JJD/SDD/SCF
F.#2012R00095

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U.S. DISTRICT COURT E.D.N.Y.
★ FEB 08 2013 ★

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★ FEB 22 2013 ★
LONG ISLAND OFFICE

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK LONG ISLAND OFFICE

- - - - -X

UNITED STATES OF AMERICA

I N F O R M A T I O N

- against -

Cr. No. 13-072 (ADS)
(T. 18, U.S.C., §§
2339A(a), 2339B(a)(1),
2 and 3551 et seq.)

JUSTIN KALIEBE,
also known as "Umar Abdur-
Rahman," "Justin Russi" and
"Omar,"

Defendant.

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THE UNITED STATES ATTORNEY CHARGES:

COUNT ONE

(Attempt to Provide Material Support to Terrorists)

On or about and between August 1, 2011 and January 21, 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JUSTIN KALIEBE, also known as "Umar Abdur-Rahman," "Justin Russi" and "Omar," together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments, communications equipment and personnel, including himself, knowing and intending that they were to be used in preparation for, and in carrying out, a conspiracy to commit at a place outside the United States an act that would constitute the offense of murder or maiming if committed in the special maritime and territorial jurisdiction of

the United States, where one or more of the conspirators would commit an act within the jurisdiction of the United States to effect an object of the conspiracy, contrary to Title 18, United States Code, Section 956(a).

(Title 18, United States Code, Sections 2339A(a) and 3551 et seq.)

COUNT TWO

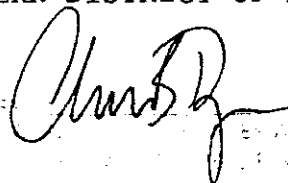
(Attempt to Provide Material Support to
a Foreign Terrorist Organization)

On or about and between August 1, 2011 and January 21, 2013, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant JUSTIN KALIEBE, also known as "Umar Abdur-Rahman," "Justin Russi" and "Omar," together with others, did knowingly and intentionally attempt to provide material support and resources, as defined in Title 18, United States Code, Section 2339A(b), including currency, monetary instruments, communications equipment and personnel, including himself, to a foreign terrorist

organization, to wit: al-Qaeda in the Arabian Peninsula, also known as Ansar al-Sharia.

(Title 18, United States Code, Sections 2339B(a)(1), 2 and 3551 et seq.)

LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

A handwritten signature in black ink, appearing to read "L. Lynch", is written over the typed name and title.